

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION
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ANGEL NARANJO (AND BLANCA NARANJO),

Plaintiffs,

07CV 04496

-against-

ANSWER TO
AMENDED
COMPLAINT

63 WALL STREET INC, 63 WALL, INC., ALAN
KASMAN DBA KASCO, AMERICAN EXPRESS
BANK, LTD, AMERICAN EXPRESS
COMPANY, AMERICAN EXPRESS TRAVEL
RELATED SERVICES COMPANY, INC., ANN
TAYLOR STORES CORPORATION, BANKERS
TRUST COMPANY, BATTERY PARK CITY
AUTHORITY, BFP ONE LIBERTY PLAZA CO.,
LLC. BFP TOWER C CO. LLC. BFP TOWER C
MM LLC, BLACKMON-MOORING-
STEAMATIC CATASTOPHE, INC. D/B/A BMS
CAT, BOARD OF EDUCATION OF THE CITY
OF NEW YORK, BOARD OF MANAGERS OF
THE HUDSON VIEW EAST CONDOMINIUM,
BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, L.P,
BROOKFIELD PARTNERS, LP,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC.,
BROWN BROTHERS HARRIMAN & CO., INC.,
BT PRIVATE CLIENTS CORP.,
DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY AMERICAS,
DEUTSCHE BANK TRUST CORPORATION,
ENVIROTECH CLEAN AIR, INC.,
FGP 90 WEST STREET, INC.,
GENERAL RE SERVICES CORP.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,

HILLMAN ENVIRONMENTAL GROUP, LLC,
HUDSON VIEW EAST CONDOMINIUM,
HUDSON VIEW TOWERS ASSOCIATES,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO.,
KIBEL COMPANIES, LEHMAN BROTHERS
HOLDINGS INC., LEHMAN BROTHERS INC.,
LEHMAN COMMERCIAL PAPER, INC.,
LIBERTY VIEW ASSOCIATES, L.P., MCCLIER
CORPORATION, MERRILL LYNCH & CO,
INC., NATIONAL ASSOCIATION OF
SECURITIES DEALERS, INC., NEW LIBERTY
PLAZA LP, NEW YORK CITY INDUSTRIAL
DEVELOPMENT AGENCY, NEW YORK CITY,
INDUSTRIAL DEVELOPMENT CORPORATION,
NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY,
NEW YORK TELEPHONE COMPANY, NEW YORK
UNIVERSITY, NOMURA HOLDING AMERICA,
INC., NOMURA SECURITIES
INTERNATIONAL, INC., ONE LIBERTY
PLAZA, R Y MANAGEMENT CO., INC.,
RELATED BPC ASSOCIATES, INC.,
RELATED MANAGEMENT CO., LP,
ROCKROSE DEVELOPMENT CORP.
RY MANAGEMENT, SABINE ZERARKA,
STRUCTURE TONE (UK), INC.,
STRUCTURE TONE GLOBAL SERVICES, INC.,
THAMES REALTY CO, THE BANK OF
NEW YORK TRUST COMPANY NA,
THE BOARD OF MANAGERS OF THE ONE LIBERTY
PLAZA CONDOMINIUM (CONDO #1178),
THE CITY UNIVERSITY OF NEW YORK,
THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178),
THE RELATED COMPANIES, LP, THE RELATED
REALTY GROUP, INC., TISHMAN INTERIORS CORPORATION,
TOSCORP INC., TRAMMEL CROW COMPANY,
TRAMMEL CORPORATE SERVICES, INC.
TRIBECA LANDING L.L.C., TUCKER
ANTHONY, INC., TULLY CONSTRUCTION CO.,
TULLY INDUSTRIES, INC, VERIZON NEW YORK,
WESTON SOLUTIONS, INC., WFP ONE
LIBERTY PLAZA CO., L.P., WFP ONE
LIBERTY PLAZA, CO. GP, CORP., WFP RETAIL CO. L.P.
WFP TOWER A CO., WFP TOWER A CO. G.P.
CORP., WFP TOWER A. CO., L.P., WFP TOWER
B CO. G.P. CORP., WFP TOWER B

HOLDING CO., LP, WFP TOWER B. CO., L.P.,
WFP TOWER D CO.G.P. CORP.,
WFP TOWER D HOLDING CO. I L.P.,
WFP TOWER D HOLDING CO, II L.P.,
WFP TOWER D HOLDING I G.P. CORP.,
WFP TOWER D. CO., L.P., AND
WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc.
("Envirotech"), as and for their responses to the allegations set forth in the Amended
Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in
the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint
dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower
Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the
above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
March 18, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY: 
Heather L. Smar (4622)